IN THE DISTRICT COURT OF THE UNITED STATES FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA)	
v.)	CR. NO. 2:06-CR-205-WHA
COURTNEY D. FLOWERS)))	

United States's Motion for Downward Departure for Acceptance of Responsibility

The United States moves this Court to reduce Courtney Flowers's offense level by one-level based on Flowers's acceptance of responsibility. As grounds for this Motion, the United States notes:

- 1. On or about the week of September 18, 2006–approximately one week prior to the pretrial conference in this case–Flowers's counsel indicated that Flowers would like to plead guilty to the charges in this case.
- 2. This was sufficiently early to permit the Government to avoid preparing for trial and to allocate its resources efficiently.
- 3. Therefore, under United States Sentencing Guidelines § 3E1.1(b), the United States makes this formal request for a one-level reduction in Flowers's offense level for acceptance of responsibility so that he shall receive a total reduction for acceptance of responsibility of three-levels.

Respectfully submitted this the 29th day of January, 2006.

LEURA G. CANARY **UNITED STATES ATTORNEY**

/s/ Christopher Snyder

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CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

> /s/ Christopher Snyder CHRISTOPHER A. SNYDER Assistant United States Attorney